

To the F.D.A.:

5/10/99

11:65 '99 MAY 17 09:45

Please follow the guidelines as expressed in the enclosed "Action Alert" To stop irradiation, the practice of which would multiply virulent pollution. Thank you.

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98N-1038

C1750

Action Alert

LAST CHANCE TO STOP FOOD IRRADIATION

Comments to FDA Needed Before May 18

The FDA is planning to remove all current labeling requirements for irradiated food. The FDA has approved irradiation for essentially all foods, including fruits and vegetables. Without labeling, there will be no way for you to know if your food has been irradiated. If labels are eliminated now, only a public health catastrophe can reinstate them. Irradiated foods could be on your table within a year—some facilities already exist, and dozens or hundreds more will be built.

The labeling requirement has been the sole impediment to widespread use of irradiation. The irradiation gang is afraid that even the current requirement—a tiny statement no bigger than the ingredients, and no statement at all for irradiated components of mixed foods—will scare consumers. The FDA proposal to remove labeling begs for ‘consumer focus’ studies that will tell it how to ‘re-educate’ the 77% of the public that does not want irradiation.

Irradiation has powerful friends in the food processing and nuclear industries, the medical establishment, and the Federal government. For several years they have been engaging in a covert public relations campaign to convince us that irradiation is the answer to food safety problems, like contaminated Guatemalan raspberries and lunch meats. But if you look at the news, these problems are overwhelmingly concentrated in the meat and poultry processing business. Jack-in-the-Box and Hudson Foods lost a lot of money. Irradiation is really just a quick (and temporary) fix for poor slaughterhouse sanitation, and a way of disposing of nuclear wastes by selling them to private industry and leaving the taxpayers to fund the inevitable clean-up costs and live in the contaminated neighborhoods left behind.

It is completely unethical to impose irradiation on people who do not want it in order to protect the factory-farmers from the consequences of their business practices.

And the FDA is trying to keep this issue out of the spotlight—it won't post comments on the Internet.

WHAT YOU CAN DO:

Send a comment to the FDA demanding prominent labeling, the use of the terms “irradiation” or “irradiated” and the use of the radura symbol. Tell the FDA you feel proposed alternative terms such as “cold pasteurization” and “electronic pasteurization” are misleading and should not be used. Say that the absence of a statement would be misleading because irradiation destroys vitamins and causes changes in sensory and spoilage qualities that are not obvious or expected by the consumer. A general statement opposing irradiation will NOT help (see reverse of this sheet), because the FDA requests comments on only two issues: “1) Whether the wording of the current radiation disclosure statement should be revised, and 2) whether such labeling requirements should expire at a specified date in the future.” The complete proposal is at <http://www.fda.gov/ohrms/dockets/98fr/021799a.txt>.

Send comments before May 18, 1999 to:

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852.

Refer to Docket #98N-1038, “Irradiation in the production, processing and handling of food”. E-mail is discouraged, because garbled messages will be discarded. Send e-mail to FDADockets@oc.fda.gov and put the docket number in the subject line.

FOLLOW THE FDA'S AGENDA IN YOUR RESPONSE, BUT GET THE STORY OUT ELSEWHERE.

Send a copy of your letter to your congressperson and your senators, and tell them that as your representatives, they are responsible for representing you, and you don't want to eat irradiated foods in any form. At the very least, these foods should be prominently labeled, and all irradiated components of a food should be identified.

Contact the media in your area (alternative weeklies, food sections, public radio, talk radio) and tell them to report on this story. Tell them you don't want to eat irradiated foods, and why irradiation is a risky technology.

ACT NOW! THIS IS OUR LAST CHANCE!!

If the FDA eliminates labeling, U.S. exporters of irradiated foods will be able to successfully claim that other countries' labeling laws are “restraint of trade” under international trade rules. Our actions now are critical!

The Campaign for Food Safety (formerly known as the Pure Food Campaign)
860 Highway 61, Little Marais, Minnesota 55614

For more information on irradiation: doder@hsc.usc.edu or the Action Alerts section of our web page with links and background: <http://www.purefood.org>

March 1, 1999

INSTRUCTIONS AND BACKGROUND FOR SENDING A COMMENT TO THE FDA PLEASE READ

WHAT KIND OF LETTER TO WRITE AND WHY

IF YOU ARE WRITING AS AN INDIVIDUAL, SEND ONE COPY TO THE FDA; OTHERWISE, SEND TWO COPIES.

If you have any expertise or personal status that bears on the issue (e.g., you are a physician, scientist, chef, farmer, food manufacturer, parent), state it in your comment.

Please note that the FDA is *only* asking for comments on the issues of 1) whether labeling of irradiated foods should remain and 2) if so, what kind of label. The FDA has already decided that irradiation is 'safe'; the irradiation advocates in the medical establishment, big agriculture, the nuclear industry and Congress know that labels frighten consumers. The irradiators know that most consumers do not want irradiated foods (77% according to a CBS poll in 1997).

But in November 1997 President Clinton signed into law a Congressional bill reducing the size of the irradiation label. As an agency overseen by Congress, the FDA is only able to ask what kind of labeling it should require. *This is not the time to tell the FDA you want labels because you want to avoid irradiated foods. The FDA wants to eliminate labels precisely because they scare consumers.* Instead, play the FDA's game—use its own arguments in favor of labeling.

The sample letters stress that the FDA's original reason for labeling is still valid—that irradiation is a process that can change the texture, taste, storage characteristics and nutrients of a food and should therefore be disclosed to avoid misleading the consumer. The FDA proposal is posted at <<http://www.fda.gov/ohrms/dockets/98fr/021799a.txt>>

Feel free to alter the sample letters as desired.

IMPORTANCE OF ACTING NOW

This really is our last chance to stop food irradiation. If labeling is eliminated, hundreds more irradiation facilities will be built. Once built, they have to be used. Not just meat and poultry, but fruits and vegetables will be irradiated. And one of the two materials commonly used for irradiating foods is radioactive for hundreds of years—that means dispersed in our communities, on our land, left behind by careless, bankrupt or irresponsible irradiators.

Our actions today have global consequences: the Codex Alimentarius, the international rule for trade in food, requires labeling of irradiated foods. If the United States eliminates its requirement, U.S. food exporters, under the General Agreement on Tariffs and Trade (GATT), can say that the Codex's requirements are a restraint of trade. And the exporters will prevail. Other countries that want labeling of imported irradiated foods will not be permitted to require it.

So it is essential that we write opinion pieces and letters to the editor, inform journalists, contact our Congressional representatives and senators, get on talk radio, and tell our families and friends. Most people don't want irradiation, and they don't like the government taking away their freedom of choice. We only have to let enough people know.

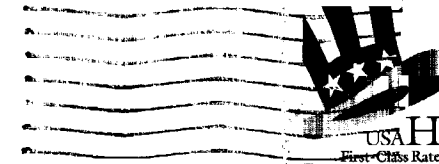
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